

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cause No. 4:22-cr-00136-RLW-SPM
	)	
CORNELIUS M. GREEN,	)	
	)	
Defendant.	)	

**FIFTH MOTION FOR ADDITIONAL TIME TO OBTAIN AND REVIEW DISCOVERY  
MATERIALS AND DETERMINE WHETHER, AND/OR WHICH, PRETRIAL  
MOTIONS ARE TO BE FILED**

Defendant Cornelius M. Green, through attorney Nicholas Williams of Kessler Williams, LLC, requests this Honorable Court extend his pretrial motions deadline an additional 60 days. In support, he states the following:

1. Defendant was indicted on two counts in the above-referenced matter, including (1) conspiracy to commit murder for hire and (2) murder for hire.
2. Defendant is charged with offenses that carry a maximum statutory penalty of death. Although the United States has filed a notice indicating its intent to not seek the death penalty, the State of Missouri has filed a notice of its intent to seek the death penalty in *State of Missouri v. Cornelius Green*, Cause Number 1622-CR04364—a state case based on the same allegations that underlie this cause. Counsel is working with Mr. Green’s state public defender to ensure that resolution of his federal case will not jeopardize his defense in state court and/or potential exposure to a sentence of death.

3. Counsel for defendant is in receipt of discovery in this matter. The discovery is voluminous. As a result, counsel for defendant requires additional time to continue to review with defendant the discovery in order to allow defendant to consider his options.

4. Counsel has received forensic evidence from the Government that may necessitate hiring an expert witness to help determine whether pretrial motions are warranted. Counsel needs additional time to locate and consult with an appropriate expert.

4. Counsel for defendant has consulted with defendant regarding this request for additional time. Defendant respectfully requests additional time.

5. To deny defendant's request for such additional time would deny counsel for defendant the reasonable time necessary to effectively investigate and prepare pretrial motions, taking into account the exercise of due diligence. Therefore, the ends of justice are served by granting defendant's request.

WHEREFORE, defendant Cornelius M. Green, by and through counsel, respectfully requests this Court grant an extension of the deadline until and including April 17, 2023, to file any pretrial motions or a waiver thereof or, in the alternative, set a status conference in order discuss the extension of time requested in this Motion.

Dated: February 14, 2023

Respectfully submitted,

/s/ Nicholas Williams

Nicholas Williams, #62617MO

1401 South Brentwood Boulevard, Suite 950

St. Louis, Missouri 63144

Phone: (314) 863-6363

Fax: (314) 727-2869

E-Mail: Nicholas.Williams@KesslerWilliams.com

*Attorney for Defendant Cornelius M. Green*

**CERTIFICATE OF SERVICE**

I hereby certify on the 14th day of February, 2023, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Assistant United States Attorney.

/s/ Nicholas Williams

Nicholas Williams